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March 18, 2024

**VIA ECF**

Hon. Margo K. Brodie

Chief United States District Judge

United States District Court, Eastern District of New York

225 Cadman Plaza East, Courtroom 6F

Brooklyn, New York 11201

Re: ***Merrill Lynch et al. v. Sohmer and Targownik***  
**(1:16-cv-01856) (MKB) (MMH) [Action I]**

***Liba Targownik v. Seymour Sohmer***  
**(1:21-cv-00172) (MKB) (MMH) [Action II]**

Your Honor:

This office represents Liba Targownik (“Targownik”), Interpleader Defendant in Action I and Plaintiff in Action II. I write in accordance with Your Honor's prior direction to the parties to file a briefing schedule for post-judgment applications and, in addition, to request permission to file said applications as letter motions.

The parties have agreed to the following briefing schedule subject to the Court's approval: motions to be filed on or before March 22, 2024; opposition on or before May 3, 2024; and replies on or before Friday, May 31, 2024.

Additionally, the parties request on consent that the post-trial applications be made by letter motion. As we have previously advised the Court, Targownik intends to move to set aside those portions of the jury verdict that make an award of compensatory damages and punitive damages to Seymour Sohmer (“Sohmer”) against Targownik because they are inconsistent as a matter of law with other findings made by the jury. Additionally, Targownik intends to move for the imposition of pre-judgment interest on the loan made by the decedent to Sohmer, interest which the estate is entitled to receive by law. Sohmer will seek interest on his claims for which the jury awarded him damages. The facts and points of law in connection with both applications are not voluminous. We therefore request that the applications, oppositions, and replies be made by letter.

Respectfully,

*Michael Calcagni*